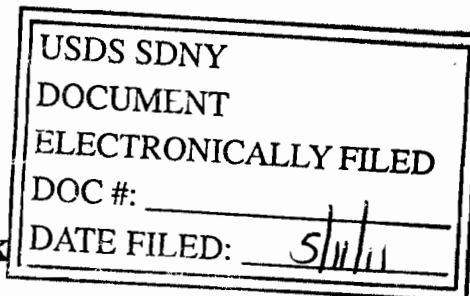


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



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In re Application of PARMALAT BRASIL)
S.A. INDUSTRIA DE ALIMENTOS and)
LAEP INVESTMENTS, LTD for an Order) Misc. No. 11-77
Pursuant to 28 U.S.C. § 1782 to Conduct)
Discovery for Use in Foreign Proceedings)
)
)
)
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STIPULATION AND ~~PROPOSED~~ ORDER SETTING BRIEFING SCHEDULE

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, and subject to the Court's approval, that:

1. The parties identified in the subpoenas issued in the above-captioned matter, *i.e.*, GLG Partners, Inc., Alejandro San Miguel, Morgan Stanley & Co. Incorporated, Morgan Stanley Capital Services, Inc., and Goldman Sachs Asset Management, L.P. (collectively, "Respondents"), shall have ten days from entry of this Order to serve and file their motions to quash the subpoenas and for any related relief ("the motions"), together with supporting memoranda, declarations, exhibits and other supporting papers.

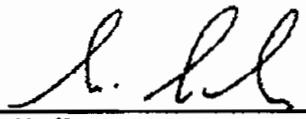
2. The parties that issued the subpoenas, Parmalat Brasil S.A. Indústria de Alimentos ("Parmalat") and LAEP Investments Ltd. ("LAEP"), shall then have twenty-one days to serve and file their opposition(s) to the motions, including any opposition memoranda, declarations, exhibits and other supporting papers.

3. Respondents shall then each have ten days to serve and file their reply submissions.

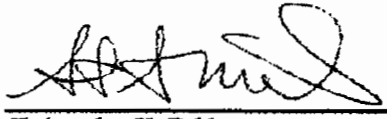
4. The date to respond to the subpoenas (initially established in the March 29, 2011 Order signed by Judge Deborah A. Batts in this matter) shall be adjourned pending resolution of the motions.

5. This stipulation, its entry by "so ordering" and the consent thereto, and its terms and conditions shall not waive or compromise, or be deemed to waive or compromise, any rights, defenses, objections or arguments that any party may have in this action or in any other proceeding, including but not limited to defenses or objections to service, all of which are expressly preserved.

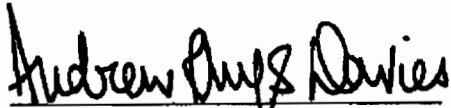
Dated: New York, New York
May 10, 2011




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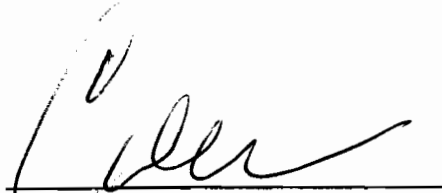


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SO ORDERED: this 11 day of May, 2011



Hon. Colleen McMahon
United States District Judge